

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ALABAMA**

ROBERT W. CHILDREE,	)	
	)	
Plaintiff,	)	
	)	
v.	)	
	)	
RADIUS GLOBAL SOLUTIONS,	)	Civil Action No.
LLC,	)	
	)	
Defendant.	)	
	)	

**NOTICE OF REMOVAL**

TO THE HONORABLE UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF ALABAMA:

PLEASE TAKE NOTICE that Defendant, RADIUS GLOBAL SOLUTIONS, LLC, (Defendant) by and through its undersigned counsel, respectfully notifies this Court of the removal of the above-captioned matter from the Jefferson County District Court of Alabama, identified by case number 01-DV-2021-905733.00 to the United States District Court for the Northern District of Alabama and shows the Court as follows:

1. This action was commenced in Jefferson County District Court, by Robert W. Childree, (Plaintiff), filing his Complaint on December 21, 2021.

2. Pursuant to 28 U.S.C. 1446(a), a copy of all process, pleadings, and orders in the state court suit is attached as “Exhibit A.”
3. Plaintiff brought this action against Defendant for alleged violations of the Fair Debt Collection Practices Act (FDCPA).
4. Defendant was served with the Complaint on December 30, 2021, via Certified Mail.
5. This Court has original jurisdiction over Plaintiff’s FDCPA claims pursuant to 28 U.S.C. 1331 which provides: “The district courts shall have original jurisdiction of all civil actions arising under the Constitution, laws, or treaties of the United States.”
6. The District Court of Jefferson County, Alabama is located in the United States District of Northern Alabama, 28 U.S.C. 89(b). Venue is proper because that is the “district and division embracing the place where the action is pending.” *See* U.S.C. 1441(a) and 1446(a).
7. The instant Notice of Removal is being filed within the thirty (30) days of Defendant having been served with the Summons and Complaint. Therefore, pursuant to 28 U.S.C. 1446(b), the instant Notice of Removal is timely.
8. Defendant will give written notice of the filing of this Notice of Removal to all adverse parties, as required by 28 U.S.C. 1446(d).

9. Defendant will file a true and accurate copy of the Notice of Removal with the District Court for Jefferson County, Alabama, as required by 28 U.S.C. 1446(d).

**WHEREFORE**, Defendant, Radius Global Solutions, LLC, respectfully requests that the aforementioned State Court Action, now pending in the District Court of Jefferson County, be removed to the United States Court for the Northern District of Alabama.

This 1<sup>st</sup> day of February, 2022.

Respectfully submitted,

/s/ Laura C. Nettles

Laura C. Nettles, Esq.

Lloyd, Gray, Whitehead & Monroe, P.C.

880 Montclair Road, Suite 100

Birmingham, AL 35213

Telephone: (205) 967-8822

Email: [lnettles@lgwmlaw.com](mailto:lnettles@lgwmlaw.com)

*Counsel for Defendant,*

Radius Global Solutions, LLC

### **CERTIFICATE OF SERVICE**

I hereby certify that on February 1, 2022 a copy of the foregoing was served electronically via CM/ECF on the following:

John G. Watts, Esq.

M. Stan Herring, Esq.

Watts & Herring, LLC

The Kress Building

301 19<sup>th</sup> Street North

Birmingham, AL 35203

/s/ Laura C. Nettles

Laura C. Nettles, Esq.